

Kimberlee A. Colbo
HUGHES WHITE COLBO
& TERVOOREN, LLC
4241 B Street, Suite 202
Anchorage, Alaska 99503
Telephone: (907) 274-7522
Facsimile: (907) 263-8320

Attorneys for Defendant ABM Industry Groups LLC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JOSHUA STUCKEY,

Plaintiff,

vs.

ABM INDUSTRY GROUPS, LLC,

Defendant.

Case No. 3:22-cv-_____-____

NOTICE OF REMOVAL

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant ABM Industry Groups, LLC, respectfully shows:

1. That on the 11th day of November, 2021, an action was commenced in the Superior Court for the State of Alaska Third Judicial District of Anchorage, entitled *Joshua Stuckey v. ABM Industry Groups, LLC*, Case No. 3AN-21-08538 Civil. Plaintiff's complaint alleges that he seeks damages "in an amount

exceeding \$100,000.” The amount in controversy is more than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendant Geico Choice Insurance Company of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished through service on the CT Corporation System, Juneau Alaska on February 7, 2022.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties to this lawsuit.

4. On information and belief, at the time this action was commenced, Plaintiff was a resident of Alaska as alleged in the Complaint.

5. At the time this action was commenced, defendant ABM Industry Groups LLC, was, and is, a corporation incorporated and existing under the laws of the state of Delaware, with its principal place of business in the state of Texas. It is not a citizen of the state of Alaska.

6. Defendant ABM Industry Groups, LLC will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant ABM Industry Groups, LLC gives notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Anchorage is hereby removed to this court.

DATED at Anchorage, Alaska, this 4th day of March, 2022.

HUGHES WHITE COLBO
& TERVOOREN, LLC,
Attorneys for Defendant ABM Industry
Groups, LLC

By: s/Kimberlee A. Colbo
Kimberlee A. Colbo
ABA No. 9211072
4241 B Street, Suite 202
Anchorage, AK 99503
Telephone No: (907) 274-7522
Facsimile No: (907) 263-8320
Email: kcolbo@hugheswhite.com

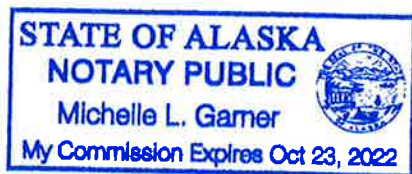
VERIFICATION


STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

Kimberlee A. Colbo, being first duly sworn, deposes and states that she is one of the attorneys for ABM Industry Groups, LLC, defendant above named; that she knows the contents of this notice of removal and that the same are true and accurate to the best of her knowledge and belief; and that she voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of ABM Industry Groups, LLC.


Kimberlee A. Colbo

SUBSCRIBED AND SWORN TO before me this 7th day of March,
2022.




Notary Public in and for Alaska
My commission expires: October 23, 2022

I hereby certify that a true and correct copy
of the foregoing was served via the court's
ECF system on the 4th day of March, 2022 on:

Colin A. Strickland
Jeffrey H. Vance
Ty A. Farnsworth
Farnsworth & Vance
2525 Gambell Street #410
Anchorage, AK. 99503

s/Kimberlee A. Colbo